

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Renee Curtis-Carey a/k/a Renee Curtis
Debtor,

Renee Curtis-Carey a/k/a Renee Curtis
Debtor/Movant

v.

PHH Mortgage Corporation as servicer for
Deutsche Bank National Trust Company, as
Trustee for Morgan Stanley Dean Witter
Capital I Inc. Trust 2003-NC2, Mortgage Pass-
Through Certificates, Series 2003-NC2
Respondent

BANKRUPTCY CASE NUMBER
16-17392-amc

CHAPTER 13

11 U.S.C. § 362

**STIPULATION AS TO DEBTOR'S MOTION FOR CONTEMPT AGAINST PHH
MORTGAGE (DOCUMENT NUMBER 80)**

AND NOW, in consideration of the mutual promises and agreements set forth below, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, it is hereby stipulated and agreed to by and between the undersigned as follows:

1. This agreement incorporates previous Court orders entered on December 2, 2016 (Document Number 13) and November 17, 2021 (Document Number 76).

2. All Attorney's Fees and Costs incurred by the Movant/Mortgagee are to be removed from the account.

3. The Debtor's Mortgage Account per previous Court order is a non-escrowed account and any reference to an escrow shortage shall be removed from the account.

4. On or before March 25, 2022, PHH shall provide Debtor and her counsel documentation showing the above corrections have been made.

5. Debtor's periodic mortgage statements shall reflect these changes no later than the regularly issued statement for April 2022.

6. Debtor's Attorneys fees will be compensated in the amount of \$1,400, payable directly to Community Legal Services by wire transfer.

7. The parties request that this Honorable Court approve this stipulation.

Dated: 3/7/2022 /s/ Kristen D. Little
Christopher A. DeNardo 78447
Kristen D. Little 79992
Lily C. Calkins 327356
Attorney for PHH Mortgage Corp

Dated: 3/7/2022 /s/ Alfonso G. Madrid
Alfonso G. Madrid, Esquire,
Community Legal Services of Philadelphia
Attorney for Debtor/Movant

AND NOW, this _____ day of _____, 2022, it is hereby ORDERED that the foregoing Stipulation is approved, shall be, and is made an Order of this Court.

BY THE COURT:

Date: March 8, 2022



HONORABLE ASHELY M. CHAN
UNITED STATES BANKRUPTCY JUDGE